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THE UNITED STATES PATENT AND TRADEMARK OFFICE

DATE: 9/29/2005

RE: Serial No.: 10/022,754

Docket No.: US01 8202

TO: Examiner: Ting ZHOU

Art Unit: 2173

Fax Number: (571) 273-8300

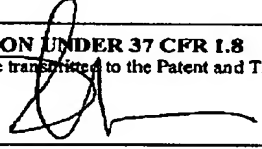
FROM: Michael J. Ure, Reg. No. 33,089

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TRANSMISSION INCLUDES: 12 Pages (including cover sheet)

Appeal Brief Transmittal - 1 page

Appeal Brief - 10 pages

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

First-Named Inventor: SHTEYN, Eugene
Application No.: 10/022,754 Conf.: 2173
Date Filed: 12/14/2001
Customer No.: 24738

Atty Docket No.: US01 8202
Art Unit: 2173
Examiner: Ting ZHOU

Title: INPUT SYSTEM USING A COMBINATION OF DATA INPUT SYSTEMS

Mail Stop Appeal Brief-Patents
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Alexandria, VA 22313-1450

TRANSMITTAL OF
BRIEF IN SUPPORT OF AN APPEAL


Sir:

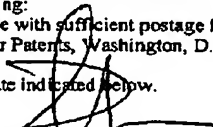
Enclosed is an original plus two copies of an Appeal Brief in the above-identified patent application.

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Respectfully submitted,
PHILIPS ELECTRONICS NORTH AMERICAN CORP.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Before the Board of Patent Appeals and Interferences

In re the Application

Inventor : Shteyn
Application No. : 10/022,754
Filed : December 14, 2001
For : INPUT SYSTEM USING A COMBINATION
OF DATA INPUT SIGNALS

APPEAL BRIEF

On Appeal from Group Art Unit 2173

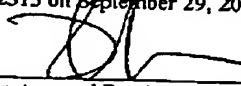
Date: September 29, 2005

By: Michael Ure
Attorney for Applicant
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Daniel Michalek
(Name)


(Signature and Date)

29-Sep-2005.

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RELATED PROCEEDINGS

EVIDENCE

TABLE OF CASES

NONE

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I. REAL PARTY IN INTEREST

The real party in interest is the assignee of the present application, Koninklijke Philips Electronics N.V., and not the party named in the above caption.

II. RELATED APPEALS AND INTERFERENCES

With regard to identifying by number and filing date all other appeals or interferences known to Appellant which will directly effect or be directly affected by or have a bearing on the Board's decision in this appeal, Appellant is not aware of any such appeals or interferences.

III. STATUS OF CLAIMS

Claims 1, 2, 4, 6 and 7 are pending, stand finally rejected, and form the subject matter of the present appeal.

IV. STATUS OF AMENDMENTS

All amendments have been entered. No amendment after final rejection has been submitted.

V. SUMMARY of the CLAIMED SUBJECT MATTER

The present invention relates to user input to an electronic device, for example a mobile electronic device. Two input devices of different classes of input devices are provided. One input device (system) is ambiguous (for example, a keypad where a key

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bears three letters). Input from another input device (system) of another class is used to perform disambiguation.

As recited in independent claim 1, the first data input system comprises a real or virtual keyboard configured to associate a specific keystroke with a plurality of graphical characters; the second data input system is a speech recognition system, a handwriting input system, or a stylus input system.

Independent claim 7 relates to a method of user input and corresponds generally to claim 1.

VI. GROUND'S of REJECTION to be REVIEWED ON APPEAL

The issues in the present matter are whether:

1. claims 1, 2, 4, 6 and 7 are anticipated by Grover.

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VII. ARGUMENT

I. Rejection of Claims 1, 2, 4, 6 and 7 as anticipated by Grover

The Grover patent was assigned at issue to Tegic Communications, Inc., the originator of the T9™ input system widely used in cell phones. When a key is pressed that represents ambiguous input (for example, A, B or C), disambiguation software chooses the most probable input based on prior inputs. For example, if the ambiguous input occurs at the beginning of a word, the most common of the ambiguous inputs would be chosen based on statistics of initial letter occurrence. When the next ambiguous input is received, both inputs are determined (the first input may be changed) based on joint statistics of occurrence, etc.

It may happen that at the end of a word, the statistically most common word is not the word intended. In this case, the user presses a button, once or repeatedly, to show a next most likely word, which the user may then select.

Claims 1 and 7, however, call for a second data input system used in disambiguation that is a speech recognition input system, a handwriting input recognition system, or a stylus input system. Grover contains no such disclosure or suggestion.

Accordingly, Grover cannot be said to render obvious the inventions recited in claims 1 and 7.

With regard to dependent claims 2, 4 and 6, these claims depend from independent claim 1, which has been shown to be patently distinguishable over the cited reference. Accordingly, these claims are also patently distinguishable and allowable over the cited references by virtue of their dependency upon an allowable base claims.

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In view of the above, applicant submits that all of the above referred-to claims are patentable over the teachings of the cited references.

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VIII. CONCLUSION

In view of the above analysis, it is respectfully submitted that the referenced teachings, whether taken individually or in combination, fail to anticipate or render obvious the subject matter of any of the present claims. Therefore, reversal of all outstanding grounds of rejection is respectfully solicited.

Date: September 29, 2005


By: Michael Ure
Attorney for Applicant
Registration No. 33,089

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IX. APPENDIX: THE CLAIMS ON APPEAL

1. A device comprising:
 - an ambiguous first data input system configured to associate a first user input with a plurality of potential data;
 - a second data input system independent from the first data input system receiving a second user input; and,
 - a processing unit coupled to the first and second input systems for selecting one of the plurality of potential data from the second user input;
 - wherein the first data input system comprises a real or virtual keyboard configured to associate a specific keystroke with a plurality of graphical characters, and the second data input system is a speech recognition input system, a handwriting input system, or a stylus input system.
2. The device of Claim 1, further comprising:
 - a display coupled to the processing unit and configured to display the selected potential data.
4. The device of Claim 1, wherein the first data input system comprises a touch-sensitive screen.
6. The device of Claim 1, wherein the processing unit further determines the selected data based on a dictionary database internally or remotely accessed.
7. A software application comprising instructions to perform the following steps:
 - associating a first user input provided by a user through a first ambiguous input system with a plurality of potential data;

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receiving a second user input through a second data input system;
processing the plurality of text data and the second user input to select one of the plurality of potential data from the second user input data;
wherein the first data input system comprises a real or virtual keyboard configured to associate a specific keystroke with a plurality of graphical characters, and the second data input system is a speech recognition input system, a handwriting input system, or a stylus input system.

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X. APPENDIX: RELATED PROCEEDINGS

NONE

XI. APPENDIX: EVIDENCE

NONE